

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JUN 14 2005

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DEPUTY
YAKIMA, WASHINGTON

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

CR-05-6019-WFN

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN COLLINS and
SUSAN COLLINS,

Defendants.

INDICTMENT

Vio: 18 U.S.C. § 1343- Wire Fraud

The Grand Jury charges:

A. INTRODUCTION

1. In July, 1999, Corey Bitton purchased a restaurant and catering business located in Pasco, Washington known as the Moore Mansion, which included an operating business and real property, for \$401,900 plus an additional \$3,100 for personal property.

2. In the summer of 2000, Corey Bitton began negotiating with John and Susan Collins for the sale of the Moore Mansion, including the property and the

1 business, to Collins. Ultimately the parties agreed on a sale price of \$1,285,000.

2 3. In connection with that proposed sale, John and Susan Collins applied
3 for a purchase loan through United Mortgage, Kennewick, Washington. United
4 Mortgage of Kennewick is a mortgage broker who is in the business of obtaining
5 financing for its customers from lenders. Ultimately, United Mortgage obtained a
6 loan for the Collins purchase through a lender, United General Mortgage.

7 8 B. PURPOSE OF THE SCHEME AND ARTIFICE

9 From on or about June 15, 2000, and continuing to on or about December
10 31, 2000, the defendants, JOHN COLLINS and SUSAN COLLINS, devised and
11 intended to devise a scheme and artifice to defraud United General Mortgage in
12 obtaining the loan for the purchase of the Moore Mansion from Corey Bitton.

13 14 C. THE SCHEME AND ARTIFICE

15 It was a part of the scheme and artifice that the defendants, JOHN
16 COLLINS and SUSAN COLLINS, overstated their income and assets in their loan
17 application submitted to United General Mortgage in order to qualify for the loan
18 for which they applied.

19 20 D. THE WIRE COMMUNICATION

21 COUNT 1

22 On or about the 20th day of September, 2000, in the Eastern District of
23 Washington, at Richland, the defendants, JOHN COLLINS and SUSAN
24 COLLINS, for the purpose of executing, and attempting to execute, the scheme
25 and artifice, transmitted and cause to be transmitted in interstate commerce, by
26 means of a wire communication, certain signs, and signals, that is, the facsimile
27

1 transmission of their loan application, which contained materially false statements
2 as to their income and assets, from the state of Washington to the state of
3 Montana, in violation of Title 18, United States Code, Section 1343.

4 DATED this 14 day of June, 2005.

5 A TRUE BILL

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8 United States Attorney

9 
10 DONALD E. KRESSE, Jr.
11 Supervisory, Assistant United States Attorney

12 
13 ROBERT A. ELLIS
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